

Chris Schnieders

From: Mullen, Kurt <kmullen@nixonpeabody.com>
Sent: Monday, May 13, 2019 4:29 PM
To: Chris Schnieders; Kelly, Brian
Cc: Adam Haenel; Matt.Donohue@hklaw.com; Joe.Franco@hklaw.com; Knights, Mark
Subject: RE: Dr. Kapoor Deposition

Chris,

Thanks for your e-mail. As you may recall, we stood down on serving objections to the document requests and filing a motion to quash while Plaintiffs and Insys worked out the supplemental joint motion to allow Insys-related witnesses to be deposed beyond the discovery deadline. We are planning to file and serve these by May 23, which is 14 days after we received your e-mail below. Please let Brian, Mark Knights or me know if you would like to discuss. Thanks.

Best,
Kurt



Kurt M. Mullen

Partner

kmullen@nixonpeabody.com

T 617-345-1113 | C 617-816-0675 | F 866-394-9156

Nixon Peabody LLP | Exchange Place | 53 State Street | Boston, MA 02109-2835

nixonpeabody.com | @NixonPeabodyLLP

The NP Boston office *has moved!* We are now located at **Exchange Place – 53 State Street.**

Please consider the environment before printing this email.

This email message and any attachments are confidential and may be protected by the attorney/client or other applicable privileges. The information is intended to be conveyed only to the designated recipient(s) of the message. If you are not an intended recipient, please notify the sender immediately and delete the message from your email system. Unauthorized use, dissemination, distribution or reproduction of this message by other than the intended recipient is strictly prohibited and may be unlawful. Thank you.

From: Chris Schnieders <CSchnieders@NapoliLaw.com>
Sent: Thursday, May 9, 2019 2:04 PM
To: Mullen, Kurt <kmullen@nixonpeabody.com>; Kelly, Brian <bkelley@nixonpeabody.com>
Cc: Adam Haenel <AHAenel@NapoliLaw.com>; Matt.Donohue@hklaw.com; Joe.Franco@hklaw.com
Subject: Dr. Kapoor Deposition

[EXTERNAL E-MAIL]

Kurt –

As you recall, we agreed to wait until after the criminal trial to take Dr. Kapoor's deposition for the Opioid MDL. Now that the trial has concluded, we need to get the deposition back on calendar. Please provide dates for the deposition in late May or June.

Thanks, Chris

Chris Schnieders

Partner



(212) 397-1000 Ext. 3120 Direct (913) 246-3860 | CSchnieders@NapoliLaw.com
6731 W. 121st Street, Suite 201, Overland Park, Kansas 66209 | [vCard](#)

[Our Mission Statement](#)

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

This e-mail and all other electronic (including voice) communications from the sender's firm are for informational purposes only. No such communication is intended by the sender to constitute either an electronic record or an electronic signature, or to constitute any agreement by the sender to conduct a transaction by electronic means. Any such intention or agreement is hereby expressly disclaimed unless otherwise specifically indicated.